



STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES  
ATTORNEY GENERAL

EXECUTIVE DIVISION  
OFFICE OF FEDERAL INITIATIVES

May 3, 2022

**By ECF**

Honorable Brenda K. Sannes  
United States District Judge  
United States District Court  
Northern District of New York  
P.O. Box 7336  
Syracuse, NY 13261

RE: *Trump v. James*, NDNY No. 21 Civ. 1352 (BKS)(CFH)

Dear Judge Sannes,

The Office of the Attorney General (“OAG”) represents Defendant, Attorney General Letitia James, in the above-captioned case. We write in advance of the oral argument scheduled for May 13, 2022 to provide the Court with supplemental information concerning the procedural posture of the *People v. The Trump Organization, Inc.*, NY County, NY Supreme Court, (NYSCEF No. 451685/2020) (hereafter, the “NY Proceeding”). In particular, please find attached the following four documents to aid in the Court’s understanding of the NY Proceeding: (1) April 26, 2022 contempt ruling ordered by Justice Engoron in the NY Proceeding, at NYSCEF No. 758, which the Court referenced in its recent text order; (2) April 29, 2022 order denying Donald J. Trump’s attempt to purge his contempt in the NY Proceeding, and directing Mr. Trump to produce a “*Jackson affidavit*” in order to purge his contempt, filed at NYSCEF No. 768; (3) counsel Alina Habba’s 4/27/22 affidavit in support of Mr. Trump’s request to purge his contempt, which addresses at paragraph 61 assertions concerning the “control” of certain documents in the possession of the Trump Organization and which bears on OAG’s *res judicata* argument; and (4) the interim order issued today by Justice Kennedy of the Appellate Division, First Department denying Donald Trump’s application for expedited relief seeking to stay the contempt order in the NY Proceeding pending appeal and referring the stay application to a full panel of the court, which will be fully submitted to the panel on May 23, 2022.

Respectfully submitted,

*/s/ Colleen K. Faherty*  
Colleen K. Faherty  
Assistant Attorney General